

8862 Ford Rd.
Kinmundy, IL 62954

Ford Farms

Fax

To: Mr. Kenneth R. Payne	From: Dwain L. Ford
Fax: (202) 720-1125	Pages: 4 including this one
Phone: (618) 292-7498	Date: 1/27/2008
Re: (618) 547-3405	CC: [Click here and type name]
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Mr. Payne

I am submitting comments on the soybean promotion and research program.

Section 610 of the Regulatory Flexibility Act (RFA)

7 CFR Part 1220

(NO. LS-05-07) (December 2, 2005, page 72257)

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8982 Ford Rd.
Kinmundy, IL 62854

January 25, 2006

Mr. Kenneth R. Payne
Chief, Marketing Programs, Livestock and Seed Program
U.S. Department of Agriculture
Agriculture Marketing Service
Room 2638-S, Stop 0251
1400 Independence Avenue, SW
Washington, D.C. 20250-0251

Dear Mr. Payne:

I personally want to thank you for the opportunity to comment on the future of soybean check off programs.

I believe the national soybean check off has been effective in the areas of promotion and research, but the national soybean check off could be more effective with some structural revisions.

Prior to 1990 the American Soybean Association developed a structure the organization thought would be beneficial for not only their ASA members, but all U.S. soybean farmers. ASA then went to Congress and lobbied for the passage to enact the national check off. In 1990 the national check off was included as part of the farm bill.

Today, the operational structure of the national check off is not as it was intended in its origin.

At the national check off level I have a great concern about accountability. The national check off board of directors are appointed to the United Soybean Board by the Secretary of Agriculture, and not elected by the farmers that pay money into the check off. Some USB directors have personally told me they do not have any obligation to justify their actions and deeds to the farmers back home, since the Secretary of Agriculture appointed them. Their concern is their actions are legal, and meeting AMS approval. This was not the intent of ASA when developing the national check off.

Local farmers should have input as to decisions that are being made for them using farmer dollars. Local soybean farmers paying money into the check off should be the ones electing the directors to the United Soybean Board.

This brings up another point of concern. The national check off is mandatory. Farmers are not given the option of asking for refunds, and for this reason, there should be accountability back to the local level. It is not fair every soybean farmer pays check off dollars, but has little or no input as to how their money is spent.

January 25, 2006

• Page 2

Every five years U.S. soybean farmers do have the option of continuing the national check off through a voting process. Today this process is complicated and not user friendly. First there is a vote to decide if there should be a referendum. I believe the request for a referendum should be done away with. Farmers should have the opportunity to vote yes they want to continue the national check off, or no, if they do not. I also have a concern about how the number of eligible farmers is calculated by USDA. This in effect determines how the request for referendum would turn out. Only farmers who have paid into the check off should be eligible to vote. With the current system it is going to be nearly impossible to ever have the opportunity to actually have an up or down vote on the national check off due to the large numbers from USDA.

Voting periods should be during times when farmers are not planting or harvesting their crops. The last election was held in May when most farmers were working long days and nights to get their crops planted. These elections should be held during winter months when farmers do not have to shut down their equipment to go to the FSA office to vote on the check off. The votes should be every 3 years not 5. This again would provide more accountability back to the local farmers.

The state and national soybean associations are and have been a very important part of soybean farmer's ability to be more competitive and profitable for over 75 years. These organizations have developed respect and credibility not only at the national level, but at the international level as well. State and national associations have had many successes in helping get legislation passed important to U.S. soybean farmers. The American Soybean Association has one of the most successful and respected international marketing programs in the world.

If U.S. soybean farmers are going to continue to be successful and competitive at the national and international level, the state and national soybean associations must be financially viable. Prior to the national check off there were provisions that 8% of check off dollars could be used for management of the state associations. With the implementation of the national check off this provision was not included. I personally spoke to the individual who was President of ASA during the national check off transition. He indicated this provision was supposed to be included in the national check off, but was omitted in the process. Without this funding the financial stability of the state and national association is continuing to decrease to levels of grave concern. In fact some state associations exist by name only providing their membership with a few or in some cases no programs at all due to lack of funding.

Since the national check off is mandatory, it has become more and more difficult to sign dues paying members to the associations, as farmers feel they already pay enough money through the check off. I have seen surveys that have been sent out by my state association verifying this. The farmers also indicated that a portion of the check off dollars should be used to pay their membership dues. They do believe the work the association is doing helps make them more profitable and competitive. Membership in the state and national association is critical, as a large membership base provides clout and means votes to legislators. This is extremely important when going to congress to get legislation passed or defeated for U.S. soybean farmers. Without a large membership base, in state and national associations, U.S. soybean farmers lose that clout and ability to have a significant impact on legislation important to U.S. soybean farmers.

January 25, 2006

• Page 3

Soybeans are a very important part of our farming operation. Some years 70% or more of our production acreage is in soybeans. We also own an independent seed company, and soybean sales make up a large part of our overall sales. In May of 1972, the Governor of Illinois presented my Grandfather the Centennial Family Farm Award. My great-great grandfather homesteaded this farm. Farming has been not only a tradition, but also a lifestyle, that has supported the Ford family for well over 134 years. My oldest son Shannon and his family are now a partner in Ford Farms adding another generation to this operation. It has been a desire of each generation before me that the next Ford generation will be allowed to continue our farming operation, and now my dream is coming true with my son now in our operation. Will Shannon be allowed to make this dream come true with his children and my grandchildren? This can only happen if our operation continues to be profitable and competitive.

Soybeans are a very important part of the viability and financial stability of not only our operation, and several thousand other soybean farmers, but to the economies of the local communities, states and the nation as a whole. It is imperative U.S. soybeans and soybean products thrive and prosper in the future.

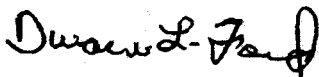
Agriculture is ever changing and it is sometimes difficult to accept, but if we do not adapt and make those needed changes the U.S. will eventually become a net importer of agriculture products instead of a world leader in agriculture exports. I continue to be very optimistic about the future of U.S. soybean farmers and all of the U.S. soybean industry. U.S. agriculture has adapted and made those needed changes from the very beginning when the pilgrims first came to America and took that first step on American soils, so their sons and daughters would have a more prosperous and better life than their own.

The structural changes I have discussed and recommended will help maintain that competitive edge and better lifestyle to insure the existence of not only our family farm, but also all U.S. soybean farmers, and the soybean industry as a whole.

Thank you again for the opportunity to comment on the national soybean check off.

If I can be of further assistance or service please let me know.

Sincerely,



Dwain L. Ford
Ford Farms